

Exhibit A3

Atkinson-Baker, Inc.

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2 IN THE UNITED STATES DISTRICT COURT

3 FOR THE SOUTHERN DISTRICT OF NEW YORK

4 -----X

5 EASTERN PROFIT CORPORATION LIMITED,

6 Plaintiff/COUNTER-CLAIM DEFENDANT,

7 CASE NO.: 18-cv-2185(JGK)

8 -against-

9

10 STRATEGIC VISION US, LLC

11 Defendant/COUNTERCLAIM PLAINTIFF.

12 -----X

13 30(b)(6)DEPOSITION OF

14 GOLDEN SPRING BY AND THROUGH AMELIA COLUCCIO

15 NEW YORK, NEW YORK

16 November 12, 2019

17

18 ATKINSON-BAKER, INC.

19 (800)288-3376

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21 REPORTED BY: KIARA MILLER

22 FILE NO.: AD0B4E5

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24

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1 A. COLUCCIO
 2 You can answer?
 3 A I don't know.
 4 **Q What did Golden Spring understand**
 5 **Guo's relationship to be with Golden Spring?**
 6 A That he's a client of Golden
 7 Spring.
 8 **Q Is he also part owner of Golden**
 9 **Spring?**
 10 A No. Not that I know of.
 11 **Q Who owns Golden Spring?**
 12 A I don't know. I know Yvette's the
 13 president, and I don't know who the owner
 14 is.
 15 **Q Well, who's the sole director of**
 16 **Golden Spring?**
 17 A I know Guo Qiang is a director.
 18 **Q And who owns all the shares of**
 19 **Golden Spring New York?**
 20 A I don't know.
 21 **Q Golden Spring Hong Kong, isn't it?**
 22 MS. TESKE: Object to the
 23 form.
 24 You can answer.
 25 THE WITNESS: Okay.

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1 A. COLUCCIO
 2 that our clients need help with.
 3 **Q Why do you call them professional?**
 4 A I don't know.
 5 **Q Well, is that what Yvette Wang**
 6 **told you to say last night, professional**
 7 **services?**
 8 MS. TESKE: Object to the form
 9 of the question.
 10 I think it's an offensive and
 11 inappropriate question.
 12 A I don't know if she used those
 13 specific words.
 14 **Q What did she tell you to say that**
 15 **Golden Spring does?**
 16 MS. TESKE: Object to the form
 17 of the question. I find it to be
 18 offensive and an inappropriate
 19 question.
 20 You can answer.
 21 A She didn't specifically tell me to
 22 say anything, but our conversation was from
 23 what I understood is that we offer services
 24 to clients within the US.
 25 **Q What kind of services?**

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1 A. COLUCCIO
 2 A Yeah, I'm sorry. China Golden
 3 Spring owns Golden Spring New York.
 4 **Q By the way, do you get paid by**
 5 **Golden Spring New York?**
 6 A Yes.
 7 **Q Does anybody else pay you for your**
 8 **work?**
 9 MS. TESKE: Object to the
 10 form.
 11 A No.
 12 **Q Who owns Golden Spring Hong Kong?**
 13 A I don't know.
 14 **Q Do you know what line of work it's**
 15 **in?**
 16 A No.
 17 **Q Do you know what line of work**
 18 **Golden Spring New York is in?**
 19 A Yes.
 20 **Q What does it do?**
 21 A So it provides professional
 22 services within the US to multiple clients.
 23 **Q What do you mean by professional**
 24 **services, what is that?**
 25 A We just assist on various projects

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1 A. COLUCCIO
 2 A I think that would be confidential
 3 between us and our clients.
 4 **Q You don't have to tell me who the**
 5 **clients are. What category? Legal**
 6 **services? Accounting?**
 7 A Yes.
 8 **Q Okay. So the answer is yes to**
 9 **legal services?**
 10 A To both. Yes.
 11 **Q You said yes to accounting as**
 12 **well?**
 13 A Yes.
 14 **Q So is Golden Spring New York a law**
 15 **firm?**
 16 A No.
 17 MS. TESKE: Objection to the
 18 form of the question.
 19 **Q It provides the services of its**
 20 **attorneys to clients?**
 21 A I'm sorry. I don't understand the
 22 question.
 23 **Q Well, what -- legal services can**
 24 **mean being a lawyer for somebody. Okay. It**
 25 **might involve filings. So I'm going, again**

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32 (Pages 122 to 125)

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1 A. COLUCCIO
 2 You can answer.
 3 A Not that I know of.
 4 **Q Does Golden Spring New York -- I**
 5 **think we talked about its offices at 162**
 6 **East 64 Street right now?**
 7 A Right.
 8 **Q Most of your time that's where**
 9 **you've been working, right?**
 10 A Right.
 11 **Q Who pays its rent for that spot?**
 12 A I don't know.
 13 **Q Does Mr. Guo pay it?**
 14 A I don't know.
 15 **Q What about its former spot, 800**
 16 **Fifth Avenue, you know the answer to that**
 17 **question?**
 18 A No.
 19 **Q What was GSNY's first office after**
 20 **it was formed?**
 21 A The first one I knew of was 800
 22 Fifth Avenue.
 23 **Q Do you know what a family office**
 24 **is; have you ever heard that term before?**
 25 A Yes.

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1 A. COLUCCIO
 2 A Somewhat. I guess not exactly.
 3 **Q Tell me what your understanding of**
 4 **what a family office is.**
 5 A I guess just a team of people who
 6 provide services to a family with whatever
 7 type of projects they need help with.
 8 **Q So is Golden Spring New York the**
 9 **family office for other families besides**
 10 **Guo?**
 11 A Not that I know of, but it's other
 12 clients are associates of the Guo family or
 13 business partners of the Guo family.
 14 **Q Okay. Does that include, for**
 15 **example, the Saraca Media Group?**
 16 MS. TESKE: Object to the
 17 form.
 18 Direct the witness not to
 19 answer.
 20 **Q Do you know the answer to that**
 21 **question?**
 22 MS. TESKE: Object.
 23 And direct the witness not to
 24 answer.
 25 **Q I mean, look, one of the purposes**

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1 A. COLUCCIO
 2 **Q Is GSNY a family office for Guo?**
 3 MS. TESKE: Object to the
 4 form.
 5 You can answer.
 6 A Yes, but not only for Mr. Guo.
 7 **Q So have you ever heard of such a**
 8 **thing as a family office for more than one**
 9 **family?**
 10 MS. TESKE: Object to the
 11 form.
 12 A I don't know.
 13 **Q Okay. Is it your testimony that**
 14 **Golden Spring New York is a family office**
 15 **for families other than the Guo family?**
 16 A Well, I just mean that the Guo
 17 family isn't our only client.
 18 **Q A family office handles the**
 19 **investments for a family, right, it handles**
 20 **the business affairs for a family?**
 21 MS. TESKE: Object to the
 22 form.
 23 **Q Is that your understanding of what**
 24 **a family office is?**
 25 MS. TESKE: Same objection.

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1 A. COLUCCIO
 2 of the research agreement was for Guo to use
 3 his own media to publicize the findings;
 4 isn't that right?
 5 MS. TESKE: Just object to the
 6 form of the question.
 7 A I believe so.
 8 **Q And is Saraca Media Group one of**
 9 **the entities that was to do that work under**
 10 **the research agreement?**
 11 MS. TESKE: Object to the
 12 form.
 13 A I'm not sure.
 14 **Q Who knows the answer to that?**
 15 A I don't know.
 16 **Q Someone at Golden Spring knows**
 17 **that, don't they?**
 18 MS. TESKE: Object to the
 19 form?
 20 A I don't know.
 21 **Q How about Guo Media, was that the**
 22 **entity that was supposed to publicize the**
 23 **research results under the research**
 24 **agreement?**
 25 A I'm not sure.

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44 (Pages 170 to 173)

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1 A. COLUCCIO
 2 A No.
 3 Q Who typically does give direction
 4 to Golden Spring on behalf of the Guo
 5 family?
 6 MS. TESKE: Object to the
 7 form. It's beyond the scope as it
 8 pertains to other clients. It's
 9 outside of the balance of the
 10 Court's order, so if you're talk
 11 about with respect to this case,
 12 then she can answer.
 13 MR. GREIM: Okay. Let's keep
 14 it with respect to this case.
 15 Q Who on behalf of the Guo Family
 16 gives direction to Golden Spring New York?
 17 MS. TESKE: Object to the
 18 form?
 19 A I believe Mr. Guo.
 20 MR. GREIM: Well, we're going
 21 to hold this deposition open. We
 22 have some disputes about the topics
 23 in the scope. I think we've had a
 24 lot of talk on the record about it,
 25 but we're not going to use up the

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1 A. COLUCCIO
 2 ordering a copy of the transcript?
 3 MS. TESKE: No one will be
 4 provided to us as a nonparty.
 5 MR. GREIM: I will order a
 6 copy.
 7 VIDEOGRAPHER: The time is
 8 1:09 p.m. Tuesday, November 12,
 9 2019. This is the end of media
 10 number Three and complete today's
 11 videotape deposition of Ms. Amelia
 12 Coluccio.
 13 (Continued on the next page to accommodate the
 14 jurat).

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1 A. COLUCCIO
 2 fingers and forearms of the court
 3 reporter or the tape any longer on
 4 that. So we're just going to hold
 5 it open and then we'll have our
 6 discussion after we're done, but I
 7 want to thank you for your time
 8 today.
 9 x: Object to the holding of
 10 the deposition open. We made the
 11 witness available all day today. If
 12 we're ending now then that is the
 13 end of the deposition. That's our
 14 position.
 15 MR. GREIM: And just to be
 16 clear, the basis of our objection or
 17 of our holding this deposition open
 18 is the witness' lack of preparation
 19 and lack of knowledge about pretty
 20 much everything about the case. And
 21 so we will explore that in more
 22 detail off the record, but thank you
 23 very much for being with us today.
 24 It was nice to meet you.
 25 COURT REPORTER: Are you

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1 A. COLUCCIO
 2 We are off the record.
 3 MR. GREIM: I will order from
 4 you and then I'll give it to her as
 5 we've been doing.
 6 (Whereupon, this examination was
 7 concluded at 1:10 p.m.)

AMELIA COLUCCIO

14 Subscribed and sworn to
 15 before me on this ____ day
 16 of _____, _____.
 17

Notary Public

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30(b)(6): Amelia Coluccio
 November 12, 2019

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<p>1 2 I N D E X 3 4 EXAMINATION BY PAGE 5 Mr. Greim 7 6 7 8 E X H I B I T S 9 GOLDEN SPRING DESCRIPTION PAGE 10 1 Notice of Deposition 7 11 2 Limited Power of Attorney 112 12 3 Declaration 129 13 4 Golden Spring's 181 14 Corporate Filings 15 16 17 18 19 20 21 22 23 24 25</p>	<p>1 2 3 C E R T I F I C A T E 4 5 STATE OF NEW YORK) 6 :ss 7 COUNTY OF NASSAU) 8 9 I, KIARA M. MILLER, a Notary Public within 10 and for the State of New York, do hereby certify: 11 That, Amelia Coluccio, the witness whose 12 deposition is herein before set forth, was duly 13 sworn by me and that such deposition is a true 14 record of the testimony given by such witness. 15 I further certify that I am not related to 16 any of the parties to this action by blood or 17 marriage and that I am in no way interested in the 18 outcome of this matter. 19 20 21 Signature requested. 22 23 24 25</p>
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<p>1 2 INDEX 3 4 R E Q U E S T S 5 DESCRIPTION PAGE 6 Notes 68 7 8 Limited Power of Attorney 76 9 10 11 M A R K E D F O R R U L I N G 12 13 PAGE/LINE 14 15 50/19 16 "Q After January 1, 2017, what work did 17 Golden Spring do for Eastern Profit? 18 19 20 21 22 23 24 25</p>	
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30(b)(6): Amelia Coluccio
November 12, 2019